

1 information concerning -- in 1993, that is, concerning the
2 expenses of the Portland station?

3 A No, no.

4 Q What about in 1992?

5 A No.

6 Q As you sit here today, have you received any
7 information concerning the circulation or the audience of the
8 Portland station in 1993?

9 A No.

10 Q The same question for 1992?

11 A No.

12 Q I want to ask you a question, sir, is the name Terri
13 Hickey a name that's familiar to you?

14 A Yes.

15 Q And tell me how you recognize the name Terri Hickey.

16 A He is an assistant secretary and officer of the
17 corporation, assistant to Jane Duff.

18 Q Now, at the time of your deposition you didn't know
19 that, did you?

20 A No.

21 Q At that time you didn't know who Terri Hickey was,
22 is that correct?

23 A No.

24 Q Am I correct?

25 A You're correct.

1 Q And at the time of your deposition, you didn't know
2 who Al Brown was, did you?

3 A No.

4 Q Do you know now who Al Brown is?

5 A Yes.

6 Q And who is Al Brown?

7 A Assistant secretary and officer of the corporation.

8 Q Was an annual meeting of NMTV held in 1993?

9 A Not yet, sir.

10 Q And you can accept this as a fact that up until 1993
11 the annual meetings were held in January of each year, do you
12 have any knowledge as to why NMTV did not hold an annual
13 meeting in January of 1993?

14 A I would think because we were holding meetings
15 either by phone or in person quite often in 1992 prior to the
16 annual meeting in other years and preparing for this very
17 situation that we are here now for.

18 MR. COHEN: Would you show the witness, Howard,
19 Bureau Exhibit 386?

20 BY MR. COHEN:

21 Q Now, Pastor, what I have asked Mr. Topel to put
22 before you is the 1992 annual meeting of NMTV and you'll
23 notice that at that meeting officers were -- and directors
24 were reelected to the positions set forth on page one. You
25 see that?

1 A Yes.

2 Q Now, in 1993, were officers and directors reelected?

3 A No, we didn't have an annual meeting.

4 Q And so the same officers were --

5 A Should serve until their successor has been duly
6 elected.

7 Q Are there any other officers of the corporation
8 other than the ones that are set forth in that document that
9 you have before you?

10 A Not to my knowledge. Well, I'm sorry, Mr. Aguilar
11 is no longer a member of the director and Mr. Ramirez is.

12 Q A director.

13 A A director.

14 Q What about the officers, are the officers the same
15 as they were?

16 A To my knowledge, yes. Here again, Mr. Aguilar was
17 vice president and he is not and we don't have a vice
18 president, to my knowledge, that we'll put in that place.

19 Q There was not vice president elected to substitute
20 for Mr. Aguilar when he ceased being a vice president.

21 A No.

22 Q So the record is clear, you have testified about Mr.
23 McCleallan reporting at board meeting and I think that we've
24 agreed that that was in January of 1992, has Mr. McCleallan
25 reported at a board subsequent to then?

1 A No, not to my knowledge.

2 Q Do you have any knowledge of NMTV's sick leave
3 policy for its employees?

4 A No.

5 Q Okay, now, since you've been a member of the board
6 of NMTV and that was in Oct -- since October of 1991, has
7 there ever been any disagreement among the directors on
8 policies or issues?

9 A None to my knowledge, no.

10 Q And there haven't been any split votes?

11 A No, only absent -- abstaining but no split votes.

12 Q I mean, nobody -- you never had a situation where
13 some people voted yes and some people voted no.

14 A No, no.

15 Q Now, at the time you deposition was taken, Pastor,
16 you did not have an understanding of the difference between
17 directors and officers of NMTV.

18 A No.

19 Q Am I correct?

20 A That's right.

21 Q At the time your deposition was taken you believed
22 they were one in the same, didn't you?

23 A Yes, sir.

24 Q Now, I want to bring you to the time that Pastor
25 Aguilar -- prior -- just prior to the time he resigned from

1 the board and let me get the facts accurately as to when he
2 resigned. Go off the record, can you help me here a minute?

3 MR. SHOOK: April 20, 1993.

4 MR. COHEN: April 20, 1993. I'm helped by my
5 colleague Mr. Shook and you can accept this as a fact, April
6 20, 1993.

7 MR. SHOOK: Bureau Exhibit 412.

8 MR. COHEN: Bureau Exhibit 112.

9 MR. SHOOK: 412.

10 MR. COHEN: 412, in fact if you want to look at that
11 to --

12 JUDGE CHACHKIN: Well, no, do you have any problem
13 with that date -- the witness have any problem with that date?

14 MR. HILL: No.

15 JUDGE CHACHKIN: All right, let's proceed.

16 MR. COHEN: Thank you, Your Honor.

17 BY MR. COHEN:

18 Q Now, are you aware that NMTV hired a private
19 detective to look into Pastor Aguilar's record prior to the
20 time he resigned.

21 A No.

22 Q And the first time you heard of that was your
23 deposition, is that correct?

24 A Yes.

25 Q Do you know who authorized the hiring of the

1 detective, the private detective?

2 A No.

3 Q And this was while he was a director, you
4 understand, I wanted to make it clear and you understand --

5 A I'm clear.

6 Q Huh?

7 A I'm clear.

8 Q You're clear on that, yeah. I want to ask you a few
9 questions about your testimony if you would. Would you look
10 at -- and your -- by your testimony I'm talking about this --
11 the blue book.

12 JUDGE CHACHKIN: The witness has Exhibit -- he has
13 it in his hand now.

14 MR. COHEN: You can take this and look, Pastor, you
15 don't have to --

16 JUDGE CHACHKIN: I think the witness could handle
17 this. If he needs help he could ask for it. What page do you
18 want him to look at?

19 MR. COHEN: Yes, sir, page 24.

20 MR. HILL: 24?

21 MR. COHEN: 2 4, yes, 2 4, Judge.

22 MR. HILL: Yes.

23 MR. COHEN: Excuse me, paragraph 24, Judge, I'm in
24 error.

25 MR. HILL: Okay.

1 MR. COHEN: That would be page 18, begins.

2 MR. HILL: Yes.

3 MR. COHEN: I wanted to ask you --

4 JUDGE CHACHKIN: Let the witness -- all right the
5 witness has it.

6 BY MR. COHEN:

7 Q I want to ask you --

8 A Okay.

9 Q What I want to ask you about is -- and spend as much
10 time on this as you need, I want to just ask you this question
11 about this sentence at the top of the page, I specifically
12 expressed an interest in acquiring a low-power station in the
13 Los Angeles, you see that?

14 A Yes.

15 Q What steps have been taken to acquire a low-power
16 station in the Los Angeles area?

17 A Well, step one, I received from our attorney here,
18 again I'm confused the name --

19 Q Colby May.

20 A Colby May -- I'll get May and then I'll know it now.
21 Colby May and from Ms. Duff, I got a complete list of low-
22 powered stations from the office of Colby May -- cross-country
23 --

24 Q Yes.

25 A -- because I was concerned. I received a copy of a

1 station in Los Angeles, I believe it's a black workshop, some
2 group that had a license that they had not developed and the
3 possibilities of getting into those. I made my own inquiry
4 about the Los Angeles low-powered station and found it to be
5 -- having quite a few problems and I didn't proceed forward
6 and I have not proceeded forward with the others that were
7 made known to me then by the --

8 Q Are you aware that the --

9 (Tape change)

10 BY MR. COHEN:

11 Q Is it your understanding that the station that the
12 black workshop was involved in is a low-powered station?

13 A It was my understanding that it was a low-powered
14 station.

15 Q Thank you. Pastor, I wanted to ask you a few
16 questions about the Community Brace Project which I'm sure
17 you're very familiar with.

18 A Yes.

19 Q Now, Community Brace is a for-profit corporation.

20 A Yes.

21 Q Okay, and you're the chief executive officer of that
22 corporation, correct?

23 A Yes.

24 Q And you're also the chairman of the board.

25 A Yes.

1 Q And you're also a stockholder.

2 A Yes.

3 Q I see, what stock ownership do you hold in the
4 corporation?

5 A I have approximate -- you mean in money?

6 Q No, in terms of -- in -- well, let's do it both, in
7 terms of percentage of stock, what percentage of stock do you
8 own?

9 A Oh, I own approximately -- I would say I own around
10 forty per cent.

11 Q And you also have invested money?

12 A Yes, I have.

13 Q And how much money have you invested in Community
14 Brace?

15 A I've invested a total of about \$40,000.

16 Q How much money all together has been invested in --
17 as you put it, into Community Brace?

18 A About \$60,000.

19 Q And where did the other \$20,000 come from?

20 A Other persons who helped me form the organization
21 plus a loan.

22 Q And one of those persons who's involved with you is
23 man named Cal Burton.

24 A That's right.

25 Q And Cal Burton is a friend of yours, correct?

1 A Yes, he is.

2 Q And he's also a stockholder, isn't he?

3 A Yes, he is.

4 Q And what percentage of stock does he own,
5 stockholder in Community Brace?

6 A He will be forty per cent of total.

7 Q And he's a director.

8 A Yes.

9 Q And he's an officer.

10 A Yes.

11 Q And what office does he hold?

12 A He is president.

13 Q And how many directors are there on Comm -- at
14 Community Brace?

15 A At the present time we have three.

16 Q And who -- and it's -- so it's you, Mr. Burton and
17 who's the third person?

18 A Our banker, believe it or not --

19 Q He's your banker?

20 A Yes.

21 Q That's sufficient for my purposes. Those are the
22 only three then.

23 A Yes.

24 Q And how long has Community Brace been in business,
25 been in existence?

1 A This is our second year.

2 Q In existence.

3 A Yes.

4 Q The second year. It was organized in 1992 or 1991?

5 A No, it would be '92.

6 Q Now, there came a time, as I understand it, and help
7 me on the dates, when you presented to Paul Crouch the concept
8 that NMTV and Trinity would loan funds to Community Brace.

9 A That's right.

10 Q And what's your best recollection of when that
11 occurred, approximately.

12 A Well, that was a week or so prior to that -- the
13 minutes -- the meeting that we had at the hotel if I can find
14 the minutes of the meeting we had at the hotel concerning
15 Community Brace, it would be a couple of weeks before that.

16 Q Let's see, the meeting is around Oct -- was that
17 October of '90 -- of '92?

18 MR. TOPEL: That was in October of '92.

19 BY MR. COHEN:

20 Q October of '92.

21 A Yes.

22 Q Okay, so it was about in the vicinity, is that
23 correct?

24 A Several weeks before that.

25 Q Okay, and you approached Pastor Crouch.

1 A Yes, I did.

2 Q Okay, and that was before you became a board member
3 -- or no, strike that -- no, no, strike that.

4 A No, I was a board member.

5 Q Of course, my years -- okay. You were then a board
6 member of NMTV?

7 A Yes.

8 Q Okay, and you approached Pastor Crouch and you asked
9 him whether -- well, tell me what you said to Pastor Crouch.

10 A I asked Pastor Crouch whether or not TBN or Minority
11 Television could make a loan to Community Brace MESBIC
12 Corporation to help us get it off the ground in our community.

13 Q And, of course, as a officer, a stockholder and a
14 director of Community Brace, you stood to personally
15 financially gain from the proposed relationship with TBN and
16 NMTV?

17 A Yes.

18 Q And --

19 A All of which, I might add, were questions that I
20 asked Mr. Crouch as to whether or not that would be possible.

21 Q And he told you it would.

22 A Well, he didn't say anything at that particular time
23 because he said he had to confer with his attorneys and his
24 internal revenue advisors and see.

25 Q But you told Mr. Crouch that you stood to personally

1 gain.

2 A Oh, yes.

3 Q So he was aware of that.

4 A Yes.

5 Q Did you tell Mr. Crouch that you were a substant --

6 strike that. Did you tell Mr. Crouch that you had invested

7 about \$40,000?

8 A I don't believe I told him that.

9 Q Did you tell him that you had been a -- that you had

10 invested funds in Community Brace?

11 A Yes.

12 Q So he knew that.

13 A Yes.

14 Q And he knew -- did you tell him that you were --

15 what your percentage of ownership was?

16 A No.

17 Q Did you tell him you were a substantial owner?

18 A Yes.

19 Q And I take it you told him you were an officer?

20 A Yes.

21 Q And you tried diligently, you and your colleagues

22 and attorneys -- your own attorney, you tried diligently to

23 persuade NMTV and TBN to supply the \$1,500,000.

24 A Yes.

25 Q And you tried to persuade them, them meaning NMTV

1 and TBN that this was a prudent investment.

2 A Yes. May I add another word?

3 Q Yes.

4 A Not only prudent, but a helpful investment to the
5 minority community.

6 Q Now, isn't it true there came a time that you were
7 informed by representatives of TBN and NMTV that you -- since
8 you could potentially personally profit from the funding by
9 Trinity and NMTV that such funding would not comply with IRS
10 rules?

11 A They didn't tell me that, they just simply said that
12 their advise from the IR -- Internal Revenue advisors was that
13 it would not be a proper investment to be made and then they
14 also reported that the MESBIC's could not receive a loan and
15 that it would have to be an investment.

16 Q Well, didn't there come a time that Norman Juggert
17 informed you that the proposed transaction put you at risk
18 under the self-dealing provisions of the California
19 Corporations Code?

20 A Yes, he did, and we refuted that.

21 Q Well, he stated that to you in a letter dated
22 January 6, 1993 and I want to show that letter.

23 MR. COHEN: Let me mention, Your Honor, Mr. Juggert
24 is going to be a witness here.

25 JUDGE CHACHKIN: Yes.

1 MR. COHEN: And I have a packet of information that
2 was supplied after discovery was completed, this came from Mr.
3 Topel. My sense is the information came from Mr. Juggert and
4 -- that whether that's true or not, I'm not going to be -- I'm
5 not going to be offering this document through the witness but
6 I guess I should identify it and then I'll be offering it
7 through Mr. Juggert.

8 JUDGE CHACHKIN: You might as well identify it so
9 that --

10 MR. COHEN: Yes, it's a packet, Your Honor, of 81
11 pages and it's --

12 JUDGE CHACHKIN: You're going to introduce the
13 entire package, is that your intent, Mr. Cohen?

14 MR. COHEN: Yes, I'm going -- it's my intention to
15 through Mr. Juggert, not through this witness, but I'll have
16 it identified now because I want to ask the witness --

17 JUDGE CHACHKIN: Do you have copies?

18 MR. COHEN: Oh, yes, oh, yes.

19 JUDGE CHACHKIN: You might want to get a copy -- all
20 right. You might as well identify them now since you want to
21 ask the witness questions and then you can move it's admission
22 when Mr. Juggert's here.

23 MR. COHEN: Yes, yes.

24 MR. TOPEL: And what's my next number, Your Honor.

25 JUDGE CHACHKIN: 218.

1 MR. COHEN: Sir, here's -- let me just hand that to
2 you. What I wanted to direct your attention to --

3 JUDGE CHACHKIN: Have you identified this as a
4 document?

5 MR. COHEN: Oh, excuse me, I'm sorry, it's not -- I
6 have not identified it.

7 JUDGE CHACHKIN: All right.

8 MR. COHEN: Yes, thank you, Your Honor, for
9 reminding me. This document, Your Honor, this 81-page
10 document is a compendium of various letters and memorandum and
11 it's -- the lead -- the first page is on the letterhead of
12 Juggert and Waymon APC Law Firm, telecopier transmission. If
13 you wish, I could identify each page.

14 JUDGE CHACHKIN: No, there's no need to do that, no.

15 MR. COHEN: But it's as I say, it's a compendium of
16 various letters and faxes. I received all of this from Mr.
17 Topel and so --

18 JUDGE CHACHKIN: It's all numbered chronologically,
19 so --

20 MR. COHEN: Yes, and I -- we've had the pages
21 numbered.

22 JUDGE CHACHKIN: Yes, the 81-page document will be
23 marked for identification as Glendale Exhibit 218.

24 (Whereupon, the document referred to
25 as Glendale Exhibit 218 was hereby

1 marked for identification.)

2 MR. COHEN: And what I wanted to direct your
3 attention to, sir, was a letter at page 80 dated January 6,
4 1993 from Norman Juggert to your colleague Mr. Burton.

5 MR. HILL: Um-hum.

6 MR. COHEN: And I'm not going to --

7 JUDGE CHACHKIN: Excuse me, what -- page are we in?

8 MR. COHEN: 80 -- page 80. I'm not going to be
9 asking you questions about this document, all I want to do is
10 point out to you that at the bottom of the first paragraph Mr.
11 Juggert stated that the terms place Reverend Hill at risk
12 under the self-dealing provisions of Section 9243 of the
13 Corporations Code which requires among other things -- among
14 other conditions that a transaction that benefits a director
15 be for the benefit of the religious organization and that the
16 terms of the transaction be fair and reasonable as to the
17 corporation.

18 BY MR. COHEN:

19 Q Now, my question to you, sir, is are you -- is it
20 your testimony that you refuted that?

21 A Yes, we did.

22 Q And when did you refute it?

23 A After we received it, our attorney talked with Mr.
24 Juggert, I think Cal Burton talked with Mr. Juggert but Mr.
25 Juggert stood by his decision that he had in the letter.

1 Q And your attorney tried to persuade Mr. Juggert that
2 the self-dealing provisions of Section 9243 of the Corporation
3 Code did not apply.

4 A Did not apply, it was based on the fact that a non-
5 profit corporation could invest in a profit corporation.

6 Q But you were unable to persuade -- or he was unable
7 to persuade Mr. Juggert.

8 A No, he wasn't and we dropped it.

9 Q Thank you, sir, that's all I have on that, thank
10 you. I wanted to turn to another area of testimony, Mr. Hill,
11 if I could -- Pastor Hill and this concerns the matter of
12 funds that may have been loaned by TBN to NMTV, my question to
13 you is, as you sit here today, do you know if NMTV owes TBN
14 any money?

15 A Yes.

16 Q And how much is owed?

17 A Approximately \$5,000,000.

18 Q And when did you learn that?

19 A Since I've been here.

20 Q At the time of your deposition you didn't know that.

21 A No, I didn't. And may I add --

22 Q Yes.

23 A -- that that \$5,000,000 includes the \$1,000,000 that
24 was transferred to MTV for the possible investment in
25 Community Brace.

1 Q Okay, and from whom did you learn this?

2 A This, of course, I've learned that since I've been
3 here.

4 Q Yeah, I say from whom.

5 A My attorney.

6 Q From Mr. Topel.

7 A Yes.

8 Q But when you were deposed in Santa Ana on September
9 29 which was -- the record will speak for itself -- a few
10 months ago, you didn't know that, did you?

11 A No.

12 Q And in point in fact, in September -- on September
13 29 you had no knowledge of what the debts were between TBN and
14 NMTV, correct?

15 A No.

16 Q So all your information is information you've
17 gleaned since you're arrived in Washington, to prepare for
18 this testimony?

19 A Well, all the information that I know, yes, has been
20 gleaned since the two weeks that I've been here.

21 Q Thank you. Now, has TBN forgiven any NMTV
22 indebtedness at any time, to your knowledge?

23 A Yes, prior to my coming on the board they forgave
24 the indebtedness to the Odessa station.

25 Q And from whom did you learn that?

1 A From the minutes and from the discussion at the
2 first board meetings that I attended.

3 Q Now, when you say that what -- indebtedness
4 concerning the Odessa station, I don't understand -- I
5 understand your words but I don't understand what you're
6 saying, explain to me what you mean by the indebtedness.

7 A Well, once upon a time the Minority Television sold
8 the Odessa station that they owned --

9 Q Yes.

10 A -- and there came a point in time that the person
11 who bought it could not make the repayment --

12 Q Yes.

13 A -- and there was a decision made that it was a --
14 that it was best for us to just give the station to the person
15 and let him continue his work rather than to close it and
16 possibly close that avenue of spiritual opportunities to
17 minister in that area.

18 Q I've confused you and I am sorry for that. What I
19 was trying to find out and my question was foggy. What I was
20 trying to find out was whether TBN has forgiven any NMTV
21 indebtedness, i.e., any money that NMTV owes --

22 A Oh, none to my knowledge.

23 Q Okay, is NMTV now paying off its debt to TBN?

24 A To my knowledge we're now paying off according to
25 the schedule of the \$27,000 a month interest free and we have

1 a balloon payment at the end of it.

2 Q And this information that you've learned since
3 you've come here --

4 A Yes.

5 Q -- and Mr. Topel is your source of knowledge.

6 A Yes.

7 Q Have you seen any document which states that the
8 payment is to be \$27,000 a month with a balloon at the end?

9 A Yes.

10 Q You do, can you tell me what document you've seen?

11 A I saw I guess you would call it the note where it
12 literally went, you know, month-by-month showing how much was
13 to come in and how much would be due at the balloon note.

14 Q And there as reference to a balloon in the note?

15 A Well, I called it a balloon note because at paying
16 \$27,000 a month you wouldn't have paid it all off.

17 Q In how many years?

18 A I think it's five years.

19 Q Yeah, well, let me see if I can help you, I'd like
20 to find the document that you're talking about.

21 JUDGE CHACHKIN: Mr. Cohen, you want any assistance
22 from Mr. Topel?

23 MR. COHEN: Well, I may have -- I may need it, Your
24 Honor, and I'm --

25 JUDGE CHACHKIN: Mr. Topel knows the numbers there.

1 MR. COHEN: Exhibit 93, all I can --
2 MR. TOPEL: It would be -- the document the witness
3 is talking about is --
4 MR. COHEN: Is that --
5 MR. TOPEL: -- Tab --
6 MR. COHEN: Are we -- are you talking -- Howard, are
7 you speaking about --
8 MR. TOPEL: It's the promissory note that's Tab -- I
9 think it's double I or something of this --
10 MR. COHEN: \$5,000,000 promissory note?
11 MR. TOPEL: On Exhibit No. 101.
12 MR. COHEN: Yeah, dated January 1, 1993? Is that
13 what you're speaking about?
14 MR. TOPEL: Yeah, um-hum.
15 MR. HILL: Yes.
16 MR. COHEN: Would you put that before the witness,
17 Howard?
18 MR. TOPEL: Uh-huh, if I can find it.
19 MR. COHEN: Thank you.
20 MR. TOPEL: Your Honor, it's TBF Exhibit No. 101,
21 Tab ii.
22 JUDGE CHACHKIN: All right, the witness has the
23 document --
24 BY MR. COHEN:
25 Q Yeah, what I'd like you to do, sir, is to show me in

1 the promissory note where there's reference to a balloon
2 payment --

3 A Well, as I said before --

4 Q -- I looked for it and I couldn't find it.

5 A As I said before, the balloon -- the word balloon
6 may have come from me because in all the notes that I've had
7 if you don't pay it off by monthly payments or yearly
8 payments, whatever is left at the end of the period is called
9 a balloon note.

10 Q So you're assumed that.

11 A Yes.

12 Q I see, and this -- I understand but you're not
13 suggesting there's any language in the note which reflects
14 that.

15 A No. The example that I'm talking about, sir, is on
16 that last page 2, after paying \$27,000 --

17 Q Where are you looking?

18 A Page 2 on the note payable, it says note payable.

19 Q The promissory note.

20 A Promissory note.

21 Q Page 2, what --

22 A Okay, at \$27,004.50 --

23 Q I don't see that on page 2 of the -- maybe I have a
24 different document than you do.

25 JUDGE CHACHKIN: Is that page 2 or page -- another

1 | page?
2 | MR. COHEN: Then I --
3 | MR. HILL: Note payable to TBN, page 2.
4 | MR. COHEN: Oh, I see --
5 | JUDGE CHACHKIN: Page 1 -- oh, you're referring to
6 | --
7 | MR. TOPEL: Page 6 of Tab ii.
8 | JUDGE CHACHKIN: Page 6.
9 | MR. COHEN: Yeah, I see it, okay.
10 | MR. HILL: With -- at page 2.
11 | MR. COHEN: Okay, so you're -- and you're assuming
12 | --
13 | JUDGE CHACHKIN: At the bottom of the page, the
14 | bottom of the page.
15 | MR. HILL: Yeah, the bottom half.
16 | BY MR. COHEN:
17 | Q You're assuming the balloon --
18 | A Yeah.
19 | Q -- is what you're saying.
20 | A Yes, it shows the \$27,000 paid and then all of a
21 | sudden it shows a total balance --
22 | Q I see.
23 | A -- and the word balloon I may have just used it
24 | myself.
25 | Q I understand. But there's no document, I take it,

1 that you're aware of executed between TBN and NMTV which
2 provides for a balloon payment?

3 A No, no.

4 JUDGE CHACHKIN: You have much more, Mr. Cohen?

5 MR. COHEN: No, I don't, Your Honor, but this --

6 JUDGE CHACHKIN: I was thinking we might finish with
7 you or we might take a break here which --

8 MR. COHEN: I think it would be -- I think it would
9 be more efficient if we took a break and I --

10 JUDGE CHACHKIN: Let's take a ten-minute break.

11 MR. COHEN: -- I'd like to review my notes and then
12 --

13 JUDGE CHACHKIN: All right. All right, we'll take a
14 ten-minute break at this time.

15 MR. COHEN: Thank you, okay.

16 (Off the record.)

17 JUDGE CHACHKIN: All right, back on the record, Mr.
18 Cohen --

19 MR. COHEN: Thank you, thank you.

20 BY MR. COHEN:

21 Q Pastor, I wanted to just ask you a few more
22 questions about this matter of the note. You have the note
23 before you, I take it?

24 JUDGE CHACHKIN: That's ii of -- I think that's
25 Exhibit 101, Tab ii. It's the last thing in the -- the last